

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 2, 2012.

Permit Number: **R30-03300001-2012**

Application Received: **July 28, 2015**

Plant Identification Number: **03-54-033-00001**

Permittee: **GrafTech International Holdings, Inc.**

Facility Name: **Anmoore Facility/ Harrison County**

Mailing Address: **P.O. Box 120**

Anmoore, WV 26323

Permit Action Number: *SM03* Revised: *January 14, 2016*

Physical Location:	Anmoore, Harrison County, West Virginia
UTM Coordinates:	561 km Easting • 4,345 km Northing • Zone 17
Directions:	Rt 58, Philippi Pike at Anmoore, WV.

Facility Description

GrafTech's Anmoore facility falls under the SIC code of 3624 for carbon and graphite products. This facility produces specialty carbon and graphite products by forming "green" carbonaceous shapes from raw materials consisting of petroleum coke and coal tar pitch. The "green" products are baked in natural gas fired, high temperature ovens and are then treated with liquid petroleum pitch and baked again prior to being processed into graphite using electrically heated furnaces. The graphite shapes are then purified, machined and processed into varying products which are further processed to enhance their properties prior to shipment. SIC Codes: 3624 - Electronic and Other Electrical Equipment & Components – Carbon and Graphite Products.

This modification is for the removal of the existing Boilers 308 and 309, and the installation of a new 12.9 mmBtu/hr boiler that will be designated as Boiler 308.

Emissions Summary

The following changes in potential emissions will result from this modification:

<i>Pollutant</i>	<i>Change in Potential Emissions (+ or -), TPY</i>
CO	-5.74
NO _x	-6.83
PM	-0.52
SO ₂	-0.04
VOC	-0.38

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 2,904.57 TPY of carbon monoxide (CO), 196.725TPY of particulate matter (PM₁₀), and 134.253 TPY of sulfur dioxide (SO₂). Due to this facility's potential to emit over 100 tons per year of criteria pollutant GrafTech is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent And Control Particulate Air Pollution from Combustion Of Fuel In Indirect Heat Exchangers
	45CSR10	To Prevent And Control Air Pollution from The Emission Of Sulfur Oxides
	45CSR13	NSR Permitting Requirements.
	45CSR16	Standards of Performance for New Stationary Sources
	45CSR30	Operating permit requirement.
	40CFR60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The following is the only permit related to this modification:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-3039A	10-20-2015	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made to the Title V permit to correspond with changes made in permit R13-3039A:

1.1. Emission Units

- Changed emission unit 308's description, year installed, and design capacity to that of the new boiler that is replacing the old 308 Boiler.
- Removed Boiler 309 from the emission units table.

3.0. Facility-Wide Requirements

- Updated citation of condition 3.4.1.
- Fixed a numbering error in Sections 3.6 and 3.7.
- Updated permit shield condition 3.7.2.b. Two of the boilers listed in the permit shield have been removed (308 & 309), but 40CFR60 Subpart Dc still does not apply to Boiler (300).

4.0. Source-Specific Requirements for Boilers [Emission Point ID(s): 300, 301, and 308]

- Removed Boiler 309 from section heading.
- In Conditions 4.1.2. and 4.1.3, removed Boiler 309 and updated the emission limits of Boiler 308 to those of the new boiler.
- In Condition 4.1.4, Boiler 308 and its emission limits and operating limits were added.
- Removed Boilers 308 and 309 from the citation of 4.2.1. New Boiler 308 is limited to only using natural gas in condition 4.1.4.a.
- Added Boiler 308 to the citations of 4.2.2 and 4.5.1.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40CFR63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. GrafTech is not a Major Source of HAPs.

40CFR63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. Gas Boilers are listed as being specifically exempt from these area source requirements under 40CFR§63.11195(e).

40CFR64 – Compliance Assurance Monitoring (CAM). Boiler 308 does not utilize a control device, thus it is not subject to CAM.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Monday, December 14, 2015
Ending Date: Wednesday, January 13, 2016

Point of Contact

All written comments should be addressed to the following individual and office:

Robert Mullins
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Division of Air Quality
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Charleston, WV 25304
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Robert.A.Mullins@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.